

**REMARKS**

This Amendment is filed in response to the Office Action mailed Oct. 13<sup>th</sup>, 2005 and in response to an Interview conducted with the Examiner on Dec. 29<sup>th</sup>, 2005. All objections and rejections are respectfully traversed.

Claims 1-53 are now pending in the case.

Claims 1, 5, 13, 14, 19, 25, 26, 35, and 37 have been amended to better claim the invention.

Claims 38-53 have been added.

***Claim Rejections – 35 U.S.C. §102***

At page 2 of the Office Action, claims 1-4, 7, 8, 13-16, 19, 23, 25-28, 32-36 were rejected under 35 U.S.C. § 102(b) as being anticipated by Chu et al., U. S. Patent No. 6,346,954, issued February 12, 2002 (hereinafter Chu)

The Applicant's claim 1, representative in part of the other rejected claims, sets forth:

1. A system for reporting information related to predetermined storage volumes in a network, the system including at least one storage appliance comprising:

    a monitor process that identifies volumes and retrieves statistical information with respect to the volumes, wherein each volume includes a cluster of physical storage disks and defines a logical arrangement of storage space;

    an interface adapted to enable ***a plurality of selected volumes to be associated with a group, the group independent of a physical arrangement of physical storage disks in the network***; and

***a reporting process that organizes and displays the statistical information with respect to the volumes associated with the group*** to interested parties.

Chu discloses a method for managing a RAID system that may have a number of drive arrays, each array including multiple disk drives. *See* col. 1, lines 30-35, col. 6, lines 33-42, and Fig 3. Information concerning an array is displayed to a user graphically in an “array frame, an iconic representation of a data storage array [that] may be graphically displayed in response to user selections.” *See* col. 6, 53-56. For example, “in Fig 6, array A frame 90 graphically displays and [sic] iconic representation of data storage array A including five physical drive ID1, ID2, ID3, ID4, and ID4 selected by the user.” *See* col. 8, lines 51-55. If a user wishes to manage other drive arrays of the RAID system, the user must switch to another array frame in the graphical user interface. *See* col. 6, lines 52-60.

The Applicant respectfully urges that Chu is silent concerning the Applicant’s claimed invention relating to “***a plurality of selected volumes to be associated with a group, the group independent of a physical arrangement of physical storage disks in the network***” and “***a reporting process that organizes and displays the statistical information with respect to the volumes associated with the group***”.

The Applicant claims associating volumes with groups ***independent of the physical arrangement of physical storage disks in the network*** for the purpose of displaying statistical information. In sharp contrast, Chu organizes and displays logical drives according to the physical arrangement of disks. Chu is focused at the physical I/O adapter level, displaying information in terms of the disks attached to a cable. Specifically, Chu organizes disks according to “Array Frames” based upon the physical arrangement of disks in an array. Chu is completely silent concerning any higher level groupings.

The Applicant claims a more flexible, higher level approach where ***a plurality of selected volumes***, are grouped ***independent of the physical arrangement of physical storage disks in the network***, and statistical information is displayed for this group.

To further illustrate the advantages of the Applicant's claims over conventional systems such as Chu, the Applicant respectfully directs the Examiner's attention to page 2, line 21- page 3, line 6 of the Specification, which states (emphasis added):

***Currently available network administration tools enable an operator to retrieve various status and performance information/reports from individual volumes, or from the entire array of network devices. While such reporting is valuable, it is often limited in usefulness, particularly where a large network of disparate users is present. For example, a large organization such as a bank may have a variety of separate departments, each having its own requirements and characteristics of network use. In order to effectively monitor and administer the various departments it is desirable to divide volumes into separate reporting groups. In addition, it may be desirable to selectively group certain volumes into more than one group where a given volume may cross certain departmental lines. For example upper management may wish to view data from a variety of departments, that are otherwise restricted to individuals in the particular departments.***

Accordingly, the Applicant respectfully urges that Chu is legally insufficient to anticipate the present claims under 35 U.S.C. § 102 because of the absence of the Applicant's claimed novel ***"a plurality of selected volumes to be associated with a group, the group independent of the physical arrangement of physical storage disks in the network"*** and ***"a reporting process that organizes and displays the statistical information with respect to the volumes associated with the group."***

***Claim Rejections – 35 U.S.C. §103***

At page 6-9 of the Office Action, claims 5-6, 9-12, 17-18, 22, 24, 28, 30-32, and 37 were rejected under 35 U.S.C. § 103(a) over Chu.

The Applicant respectfully notes that claims 5-6, 9-12, 17-18, 22, 24 and 28, 30-32, and 37 are dependent claims that depend from independent claims believed to be in condition for allowance. Accordingly, claims 5-6, 9-12, 17-18, 22, 24, 28, 30-32, and 37 are believed to be in condition for allowance.

In the event that the Examiner deems personal contact desirable in the disposition of this case, the Examiner is encouraged to call the undersigned attorney at (617) 951-3078.


All independent claims are believed to be in condition for allowance.

All dependent claims are believed to be dependent from allowable independent claims.

The Applicant respectfully solicits favorable action.

Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,



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